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Attorneys for Defendant
CIGNA HEALTH & LIFE INSURANCE
COMPANY

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

JONATHAN SANTIAGO, individually,
and on behalf of other members of the
general public similarly situated;

Plaintiff,

v.

CIGNA HEALTH & LIFE INSURANCE
COMPANY, an unknown business entity;
and DOES 1 through 100, inclusive,

Defendant.

Case No. 1:20-CV-01413-NONE-SKO

NOTICE OF SETTLEMENT

NOTICE OF SETTLEMENT

CASE NO. 1:20-CV-01413-NONE-SKO

1 **TO THE HONORABLE COURT AND ALL PARTIES IN THIS MATTER:**

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3 **PLEASE TAKE NOTICE** that after further settlement communications with mediator Mark
4 Rudy, Esq. a settlement in principle was reached by the parties in this action and the related
5 consolidated class and PAGA actions pending in the Superior Court of the State of California for the
6 County of Tulare, styled, "*Plaintiffs JONATHAN SANTIAGO and ADRIAN AVILA, on behalf of the*
7 *State of California, as private attorney general, Plaintiffs, v. CIGNA HEALTH & LIFE INSURANCE*
8 *COMPANY, a Corporation; and Does 1 through 50, Inclusive,*" Case No. VCU283599.

9 IT IS HEREBY STIPULATED by and between Plaintiffs Adrian Avila and Jonathan Santiago
10 and Defendant CIGNA Health and Life Insurance Company ("Defendant"), by and through their
11 respective counsel, and subject to approval by this Court, that in order to avoid duplication of efforts
12 by multiple courts and inconsistent rulings on the settlement, and in light of the fact that a related class
13 action and PAGA action is pending outside of this Court, the Parties stipulate and agree to seek
14 approval of the settlement in this action together with approval of the class action in the Tulare County
15 Superior Court, and respectfully request that this matter is stayed in all respects pending final approval
16 by the Tulare County Superior Court. In the event the settlement is approved, Plaintiffs shall report
17 such approval to this Court and request a dismissal of this action. In the event the settlement is not
18 approved, the Parties will so inform the Court and request a lifting of the stay.

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21 Date: October 25, 2021

LAWYERS for JUSTICE, PC

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23 By: /s/ Edwin Aiwazian
24 Edwin Aiwazian
25 *Attorneys for Plaintiff*

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CASE NO. 1:20-CV-01413-NONE-SKO

1 Dated: October 25, 2021

LITTLER MENDELSON, P.C.

2
3 By: /s/ Linda N. Bollinger

4 KEITH A. JACOBY

LINDA N. BOLLINGER

JACQUELINE MENENDEZ

Attorneys for Defendant

6 CIGNA HEALTH & LIFE INSURANCE
COMPANY

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